



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JAM
F. #2019R00989

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 4, 2023

By ECF

Kevin K. Tung, Esq.
Kevin Kerveng Tung P.C.
136-20 38th Avenue Ste. 3D
Flushing, NY 11354

By ECF and Email

Re: United States v. Shujun Wang
Criminal Docket No. 22-230 (MKB)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, including:

- Information provided by Google regarding accounts registered or controlled by defendant, Bates numbered WS1378-1380;
- Copies of DVDs recovered during the execution of search warrants at the defendant's residences, Bates numbered WS1381-1418;
- Photographs of the defendants, Bates numbered WS1419-1420;
- FBI FD-302s describing pertinent evidence, Bates numbered WS1429-1506;
- Copies of electronic media items recovered during the execution of search warrants at the defendant's residences, Bates numbered WS1508-WS1519;
- Customs and Border Protection ("CBP") report from April 22, 2019, Bates numbered WS1520-1526;
- Apple iOS File System Report, Bates numbered WS1527; and
- AdLab forensic report, Bates numbered WS1528.

Also being provided is a log of electronic media recovered items during the execution of search warrants at the defendant's residences, Bates numbered WS1507, which also lists material produced in prior productions. The government requests that defense counsel provide the government with a one-terabyte electronic storage media on which the government can load copies of the aforementioned materials.

Please note that all of the items being produced have been designated as “Sensitive Discovery” under the terms of the September 6, 2022 Protective Order, ECF Docket No. 20.

Please also note all translations are in draft form and subject to change. The images of various electronic media may require a viewing program such as AdLab or FTK, which are publicly available or included with the enclosed discovery. You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling me to arrange a mutually convenient time.

The government reiterates its request reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Artie McConnell
Artie McConnell
Assistant United States Attorney
(718) 254-7150

Enclosures

cc: Clerk of the Court (MKB) (by ECF) (without enclosures)